

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

In re: BUBACAR B. BARRY, _____ Debtor. WORLD BUSINESS LENDERS, LLC, Plaintiff, v. BUBACAR B. BARRY, Defendants.	Bankruptcy No. 5:15-bk-05281-RNO Chapter 7
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PLAINTIFF'S INITIAL DISCLOSURES PURSUANT TO FED. R. BANKR. P. 7026(a)

AND NOW, comes World Business Lenders, LLC (“WBL” or “Plaintiff”), by and through its undersigned counsel, Bernstein-Burkley, P.C., and hereby makes the following Initial Disclosures (“Disclosures”) to Defendant, Bubacar B. Barry (“Defendant”) pursuant to Rule 7026(a) of the Federal Rules of Bankruptcy Procedure (“Bankruptcy Rules”), stating as follows:

1. Plaintiff reserves the right to rely on any witness or document identified by Defendant in Defendant’s disclosures.
2. Plaintiff reserves the right to supplement these Disclosures.
3. Any supplementation of or to these Disclosures is to be automatic through the discovery process, thus obviating any formal update to these instant Disclosures.
4. Plaintiff reserves the right to call any other witness as more information becomes available, including, without limitation, for substantive, rebuttal, and/or impeachment testimony. Plaintiff further reserves the right to introduce and rely upon any document or communication, in addition to those identified in these Disclosure, in support of the relief sought by Plaintiff in the above-captioned proceeding.

5. Disclosure of individuals with discoverable information. Subject to the reservations set forth above, Plaintiff identifies the following individuals and/or entities that may have discoverable information:

- a) World Business Lenders, LLC
120 West 45th Street
New York, NY 10036
*Corporate designee to be provided upon request

6. Disclosure of documents. Documents, data compilations, and tangible things in the possession, custody, or control of the Plaintiff relevant to the claims asserted against Defendant (“Documents”) include, but are not limited to:

- a) Business Promissory Note and Security Agreement, together with all supplements and addenda thereto;
- b) Continuing Guaranty for Defendant;
- c) Commonwealth of Pennsylvania Certificate of Title for the 2009 Mercedes Benz, VIN No.: 4JGBB86E39A530776; and,
- d) Entry of Appearance and Praeclipe for Assessment of Damage and Confession of Judgment filed in the Court of Common Pleas of Monroe County, Pennsylvania, Civil Action No. 2014-11077.

Plaintiff intends to produce all relevant, non-privileged documents in Plaintiff's possession or control to Defendant in response to any proper discovery request. Plaintiff reserves the right to amend or supplement these Disclosures to the extent it locates additional categories of Documents that it may use to support its claims set forth herein.

7. Damages. Plaintiff seeks the entry of an order determining that the debt owed by Defendant is non-dischargeable through the Defendant's bankruptcy pursuant to 11 U.S.C. § 523. Plaintiff further seeks the entry of an order denying the Defendant's discharge pursuant to 11 U.S.C. § 727(a)(2).

8. Insurance. Plaintiff is not aware of any insurance policy that covers the claims asserted against Defendant.

WHEREFORE, Plaintiff, World Business Lenders, LLC, submits the foregoing Disclosures to the Defendant, Bubacar B. Barry.

BERNSTEIN-BURKLEY, P.C.

Date: June 10, 2016

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